EXHIBIT 20

From:

Tom Reilly

Sent:

Friday, January 31, 2014 1:06 PM

To:

Jo Taylor; Daniel Mong; Mike Bacon; Rick Oberholzer; Steve Farnden

Cc:

Tom Reilly

Subject:

RE: Outsourcing Business Case

Hi Jo, Will we, via the on-line procurement tool, be able to review the RFP in its entirety and in context or will you be gathering snippets from the RFP and presenting them in another form? Also, the RFP process has been going on now for more than a half year but I've not been approached on even a single occasion and asked to contribute. Is that the case only with me or has everyone but me been asked to contribute? Having (as did others) played a large role in building, automating and managing the service over the past 14+ years, I initially assumed my feedback would be valued and sought after so am surprised to have reached this point having provided no input.

Tom Reilly Sr Consultant **EIS EST CBS IT Services**

GSK

1250 S. Collegeville Road, Building 30-1026CM, Collegeville, Pennsylvania, 19426-0989, United States Email Tom.Reilly@gsk.com

+1 610 962 1836

gsk.com | Twitter | YouTube | Facebook | Flickr



From: Jo Taylor

Sent: Thursday, January 30, 2014 10:45 AM

To: Tom Reilly; Daniel Mong; Mike Bacon; Rick Oberholzer; Steve Farnden

Subject: RE: Outsourcing Business Case

Tom

The RFP is an on-line procurement tool however I will be able to share the description of services, deliverables, and service levels that were put into the tool

Jo.

Jo Taylor Mgr Service Delivery iSeries **EIS EST CBS IT Services**

GSK

Stockley Park West, 1-3 Ironbridge Road, Uxbridge, Middlesex, UB11 1BS, United Kingdom

65K-2

 Email
 jo.x.taylor@gsk.com

 Mobile
 +447825116148

 Tel
 +442070767110

gsk.com | Twitter | YouTube | Facebook | Flickr

<< OLE Object: Picture (Device Independent Bitmap) >>

From: Tom Reilly

Sent: 30 January 2014 14:51

To: Jo Taylor; Daniel Mong; Mike Bacon; Rick Oberholzer; Steve Farnden

Cc: Tom Reilly

Subject: RE: Outsourcing Business Case

Hi Joe, Are the Outsourcing Business Case and the Request For Proposal (RFP) one in the same or are they separate documents? If they're separate documents, can we for the sake of transparency also review the RFP (both the original and current form) to understand the contents, the rationale for arriving at the content and the services/responsibilities that are being proposed to be outsourced to the vendor?

Tom Reilly Sr Consultant EIS EST CBS IT Services

GSK

1250 S. Collegeville Road, Building 30-1026CM, Collegeville, Pennsylvania, 19426-0989, United States Email Tom.Reilly@gsk.com

Tel +1 610 962 1836

gsk.com | Twitter | YouTube | Facebook | Flickr

<< OLE Object: Picture (Device Independent Bitmap) >>

----Original Appointment----

From: Jo Taylor

Sent: Thursday, January 30, 2014 6:17 AM

To: Jo Taylor; Daniel Mong; Mike Bacon; Rick Oberholzer; Steve Farnden; Tom Reilly

Subject: Outsourcing Business Case

When: Friday, February 07, 2014 10:00 AM-11:00 AM (GMT-05:00) Eastern Time (US & Canada).

Where: LM

https://www.livemeeting.com/cc/meetqsk1/join?id=SN34Z7&role=present&pw=fb%22X*H%2CX5

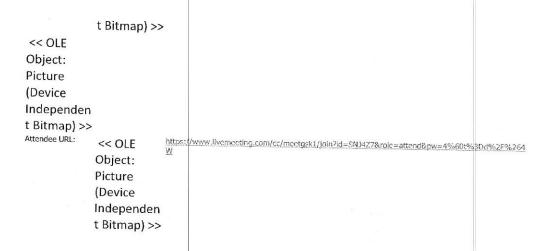
Presenter URL:

<< OLE Object:

Picture

(Device

Independen



Following feedback from 1:1 with Steve Miller, I understand that you have asked questions regarding having access to the business case financial model used for the Outsourcing proposal.

I'm happy to share this information with you and answer your questions, but must ask that due to the fact that a business decision and commercial terms are not yet agreed that none of this information is shared outside of this team. I'd also ask that no screenshots are taken during the Live Meeting due to the confidentiality of this.

Thanks

Jo

EXHIBIT 21

Page 1

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

- - -

THOMAS REILLY, : NO. 17-2045

Plaintiff, :

vs.

GLAXOSMITHKLINE, LLC, :

Defendant. :

Friday, January 18, 2019

DISCOVERY DEPOSITION of HENRY BOLTON, taken at Reed Smith, LLP, Three Logan Square, 1717 Arch Street, Suite 3100, Conference Room D, Philadelphia, Pennsylvania, commencing at 1:04 p.m., before Gina E. Scheetz, Registered Merit Reporter, Certified Realtime Reporter, a New Jersey Certified Court Reporter, a Delaware Certified Court Reporter, Certified LiveNote Reporter, Licensed CaseViewNet Realtime Provider, an iCVNet Certified Reporter and Notary Public.

ZANARAS REPORTING & VIDEO
Registered Professional Reporters
1845 Walnut St., Suite 938 2112 Bay Avenue
Philadelphia, PA 19103 Ocean City, NJ 08226
(215) 790-7857 1-877-GO-DEPOS

Case 2:17-cv-02045-JCJ Document 39-4 Filed 06/10/19 Page 7 of 12 HENRY BOLTON

		Page 2
1	COUNSEL	APPEARED AS FOLLOWS:
2 -		POLLINS LAW
		BY: SCOTT POLLINS, ESQUIRE
3		303 West Lancaster Avenue Suite 1C
4		Wayne, Pennsylvania 19087
		610.896.9909
5		E-mail: scott@pollinslaw.com
		tashell@pollinslaw.com
6		Representing the Plaintiff
7		DEED CMITTLE LLD
8		REED SMITH, LLP BY: BETTY S. W. GRAUMLICH, ESQUIRE
		BY: ANNE E. ROLLINS, ESQUIRE
9		Riverfront Plaza - West Tower
		901 East Byrd Street
10		Suite 1900
11		Richmond, Virginia 23219-4068 804.344.3456
		E-mail: bgraumlich@reedsmith.com
12		arollins@reedsmith.com
		Representing the Defendant
13		
14		
	ALSO PRE	SENT:
15		
		ELIZABETH FEENEY,
16		GlaxoSmithKline, LLC
17		THOMAS REILLY
18		
19		
20		
21		
22		
23		
24		
L		

Case 2:17-cv-02045-JCJ Document 39-4 Filed 06/10/19 Page 8 of 12 HENRY BOLTON

			Page 3
1		INDEX	
2	WITNESS		PAGE
3	HENRY BOLTON		
4	By Mr.	Pollins	5
5			
6		EXHIBITS	
7			
8	NUMBER	DESCRIPTION	MARKED
9	GSK 55	E-mail String, 4 pages	88
10	GSK 56	2-page Document	92
11	GSK 57	Document entitled "Notes from mtg of	98
13	CON FO	6 May.txt"	1.01
14	GSK 58	Document entitled "iSeries/AS400 Outsourcing," Confidential	101
15 16	GSK 59	Document entitled "Risk Assessment of iSeries Remote Support,"	105
		Confidential	
17	GSK 60	3-page Document	115
19	GSK 61	Document dated 3/9/15	121
20			
21			
22			
23			
24			
Ц			

Case 2:17-cv-02045-JCJ Document 39-4 Filed 06/10/19 Page 9 of 12 HENRY BOLTON

	Page 4
1	
2	DEPOSITION SUPPORT INDEX
3	
4	Direction to Witness Not to Answer
5	Page Line Page Line Page Line
6	None
7	
8	Request for Production of Documents
9	Page Line Page Line Page Line
10	None
11	
12	Stipulations
13	Page Line Page Line Page Line
14	None
15	
16	Question Marked
17	Page Line Page Line Page Line
18	None
19	
20	
21	
22	
23	
24	
L	

		Page 5
1		
2		HENRY BOLTON, having been duly
3	sworn,	was examined as follows:
4		
5		MADAM REPORTER: And the
6	witnes	ss will read and sign; correct?
7		MS. ROLLINS: Yes.
8		THE COURT REPORTER: Thank
9	you.	
10	BY MR. POLLIN	ıs:
11	Q	Please state your full name.
12	А	Henry Jacob Bolton.
13	Q	And, Mr. Bolton, you live in
14	the U.K.?	
15	А	I do.
16	Q	We're here today for something
17	called a depo	osition. Have you ever done a
18	deposition be	efore?
19	А	I have not.
20	Q	What I'm gonna be doing is I'm
21	gonna be aski	ng you a series of questions.
22	You're going	to give answers.
23		If I ask you a question and
24	you don't hea	ar what I say, let me know and

	Page 12
1	A I don't think you could see
2	them all, no.
3	Q Okay. What was the job that
4	you had before Director of Service Delivery?
5	A So I think it would have been
6	leading the AS/400 team and yeah, I think
7	that's right.
8	Q How long were you leading the
9	AS/400 team for?
10	A Jo departed, I believe, around
11	about March of '14, 2014, and then returned
12	about a year later. I think maybe a touch
13	less than that I think I transitioned out in
14	maybe February of '15. My memory isn't
15	necessarily gonna give us exact dates, but
16	it's something like that.
17	Q What were you doing before you
18	were leading the AS/400 team?
19	A I can't recall exactly.
20	Q What's your highest level of
21	education?
22	A A degree.
23	Q In what discipline?
24	A Economics.
Ī	

		Page 114
1	happening, did i	t?
2	A It	happened in some cases.
3	Q Ok	ay.
4	A It	didn't happen everywhere.
5	Business priorit	ies moved around.
6	Q Al	l right. By the time you
7	signed this, Blu	e Chip was already the
8	winner of the ou	tsourcing; correct?
9	A Th	at would have been correct.
10	This was signed	in June, wasn't it?
11	(Reviewing.) Ye	ah. So, yes.
12	Q Ab	ove the rationale for the
13	proposal part th	at I asked you to read, it
14	says, "The finan	ce systems are subject to
15	Sarbanes-Oxley r	egulations."
16	Do	you see that?
17	A I	do.
18	Q Th	e finance systems would
19	include the AS/4	00s that were running the
20	financial system	s servers; correct?
21	A Ye	s.
22	Q Ok	ay.
23	MR	. POLLINS: GSK 60.
24	MA	DAM REPORTER: Sure.